

Before The  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In re Application of )

**ELLIS THOMPSON CORPORATION** )

For facilities in the Domestic )  
Public Cellular Telecommunications )  
Radio Service on Frequency Block )  
A, in Market 134, Atlantic City, )  
New Jersey )

CC Docket No. 94-136

File No. 14261-CL-P-134-A-86

DOCKET FILE COPY ORIGINAL

To: Honorable Joseph Chachkin  
Administrative Law Judge

**MOTION FOR EXTENSION OF TIME**

The Ellis Thompson Corporation ("ETC"), by its attorneys, hereby moves the Presiding Judge for an extension of time within which to respond to the Petition to Intervene ("Petition") filed by Ameritel on February 6, 1995, in the above-captioned proceeding. Pursuant to Section 1.294(b) of the Commission's rules, any oppositions to the Petition are due today, February 15, 1995. For reasons discussed below, ETC respectfully requests an extension until Tuesday, February 21, 1995, for the filing of a responsive pleading.

The certificate of service accompanying the Petition indicates that on February 6, 1995, a copy of the pleading was sent to both counsel for ETC: Stoll, Stoll, Berne, Lokting & Shlachter, P.C. (SSBL&S) and to Fleischman and Walsh, L.L.P. (F&W). However, SSBL&S did not receive its copy of the pleading until February 13, 1995 and F&W has yet to receive its service.

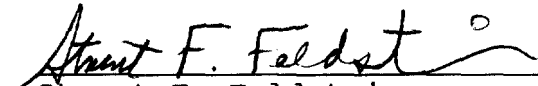
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copy.<sup>1</sup> Indeed, the earliest either of the ETC counsel or ETC itself was even aware that the February 6, 1995, Petition had been filed was on February 13, 1995. Put simply, because it has only just received a copy of the Petition, ETC needs a few additional days in order to properly evaluate the Petition and prepare a responsive pleading. In view of the foregoing, ETC submits that good cause exists for an extension of time until Tuesday, February 21, 1995 to file its views with respect to the Petition. Thus, the requested extension of time should be granted.<sup>2</sup>

Respectfully submitted,

ELLIS THOMPSON CORPORATION

By:   
Stuart F. Feldstein  
Richard Rubin  
Christopher G. Wood

Its Attorneys

Fleischman and Walsh, L.L.P.  
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Washington, D.C. 20036  
(202) 939-7900

February 15, 1995

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<sup>1</sup>On February 14, 1995, upon discovering that the Petition had been filed, F&W requested counsel for Ameritel to provide it with a copy. A copy was provided on that date.

<sup>2</sup>Pursuant to Section 1.46(c) of the Commission's rules, all parties to the captioned proceeding and counsel for Ameritel have been informed of the filing of the instant motion.

**CERTIFICATE OF SERVICE**

I, Robert S. Childress, a secretary in the law firm of Fleischman and Walsh, L.L.P., do hereby certify that I have on this 15th day of February, 1995, had copies of the foregoing "Motion For Extension of Time" mailed by U.S. first class mail, postage prepaid, to the following:

- \* Honorable Joseph Chachkin  
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- \* Joseph Paul Weber, Esquire  
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- \* Terrence E. Reideler, Esquire  
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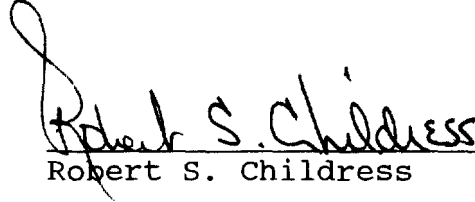
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\* By Hand